

SECY.

RECEIVED
3/29/84

4134 (910)
R/S

Attachment to Memo to Council
on WRD/USGS issue. R/S

FEB 9 1984

Confidential Claim Retracted

Authorized by: SC

Date: 6/25/83

Memorandum

To: Director (300)

From: State Director, NM

Subject: USGS Water Resources Division (WRD) Assistance on Jackpile-Paguate
EIS

After 2 months of discussions with the District Chief of the WRD Office of the USGS in Albuquerque, we have reached an impasse as to the degree and type of WRD assistance which we can obtain on the project. As you know, the Jackpile EIS involves the closure and reclamation of the largest open-pit uranium mine in the free world. The degree to which the water table will reinstate itself after reclamation appears to be the central issue involved in our EIS.

The Bureau of Land Management has requested that an hydrologist be assigned to this project who has verifiable expertise in the field of ground water modeling. Specialized knowledge in evaluating and predicting ground water recharge on disturbed sites as well as the ability to identify the strengths and weaknesses in data, methods, interpretations and conclusions as prepared by private consultants is required. This person must also be able to appear as an expert witness on behalf of the Secretary of the Interior if the EIS is challenged legally. WRD states that because of existing policy, an hydrologist able to provide the hydrologic input to the EIS and testify in any subsequent court proceedings cannot be provided. According to the WRD Office in Albuquerque, the only way in which WRD personnel could be in a position to testify would be after the completion of a specific WRD project on Jackpile. In this case, 18 months and approximately \$95,000 would be needed to complete such a project. We do not believe such a delay can be justified in this instance. It is imperative that we finish our EIS quickly and commence reclamation in order to protect the public health.

Although the Jackpile-Paguate EIS represents our most immediate need, we are concerned with the broader implications of a policy that appears to preclude the use of the most knowledgeable experts in hydrology within the Department of the Interior by other agencies within the Department in need of their expertise. We have a continuing need for that expertise here in New Mexico.

Your consideration and assistance in this matter to either enable us to obtain the needed quality WRD assistance or in providing alternative means to obtain the hydrology input is requested. I must stress again that time is of the essence in this project due to public health implications.

/s/ Charles W. Luecker



9388995

POL-EPA01-0007133

910:WJordan:DWLlson:vpr:2/8/84:x6030:x6024

CONFIDENTIAL